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Attorneys for Defendant  
Rocket Mortgage, LLC

**IN THE UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

Theresa Goodfellow,  
Plaintiffs,

v.

Equifax Information Services, LLC.  
Experian Information Solutions, Inc,  
TransUnion LLC; Rocket Mortgage  
LLC,

Defendants.

CASE NO.: 2:24-cv-01072-JAM-DMC

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

1 Plaintiff Theresa Goodfellow (“Plaintiff”) and Defendant Rocket Mortgage, LLC  
2 (“Rocket Mortgage”), by and through their undersigned counsel, hereby stipulate and  
3 agree, pursuant to EDCR 2.35, to extend the discovery deadline set forth in this Court’s  
4 Pretrial Scheduling Order by approximately thirty days (30) days, to July 25, 2025. This  
5 stipulation is supported by good cause, is the parties’ first request, and is not made for  
6 any purposes of delay.

7 The Court issued its Pretrial Scheduling Order on or about January 24, 2025. *See*  
8 Dkt. No. 35. Since that time, the parties have been dutiful in exchanging written  
9 discovery. Such efforts include negotiating a protective order, serving their initial  
10 disclosures, serving and responding to multiple sets of written discovery, and producing  
11 a significant number of documents. Following this exchange of written information, the  
12 parties are now in a position to take the depositions of Plaintiff and certain  
13 employees/corporate representatives of Rocket Mortgage. While Plaintiff’s deposition  
14 occurred on June 18, 2025, given scheduling conflicts of certain deponents from Rocket  
15 Mortgage and Rocket Mortgage’s counsel, those depositions cannot occur before the  
16 current discovery deadline of June 27, 2025. The Rocket Mortgage deponents and  
17 counsel, however, are available, in July 2025, and all of the identified depositions can  
18 occur on or before July 25, 2025 absent any unforeseen delays. Plaintiff’s counsel has  
19 raised a concern about the need for expert testimony post depositions depending upon  
20 what factual or legal issues may arise. Rocket Mortgage is not inclined to stipulate to  
21 moving any expert disclosure dates. If after depositions are finished Plaintiff may file a  
22 separate motion requesting additional time for expert disclosures.

23 The requested extension is limited in time and will allow all the deponents to be  
24 deposed in an orderly manner. Moreover, this stipulation will not alter any other Court  
25 ordered deadlines. *See* Dkt. No. 35, 39. Specifically, this stipulation will not change or  
26 alter the settlement conference scheduled for July 31, 2024, the August 22, 2025 deadline  
27 to file dispositive motions, the October 21, 2025 hearing date for the dispositive motions,  
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the January 9, 2026 final pre-trial conference, or the March 9, 2026 trial date.

**IT IS SO STIPULATED.**

DATED this 20th day of June 2025.

DATED this 20<sup>th</sup> day of June 2025.

**GALE, ANGELO, JOHNSON P.C.**

**SPENCER FANE LLP**

/s/ Joe Angelo

/s/ Jedidiah L. Dooley

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Attorney for Plaintiff Theresa  
Goodfellow

Attorneys for Defendant  
Rocket Mortgage, LLC

**ORDER**

Based upon the foregoing Stipulation of the Parties, and for good cause appearing therefore, the discovery deadline is **EXTENDED** to **July 25, 2025**. All other deadlines in the Pretrial Scheduling Order (ECF No. 35) shall remain in effect.

**IT IS SO ORDERED.**

Dated: June 23, 2025

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ

SENIOR UNITED STATES DISTRICT JUDGE